
**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

No. 08 CR 70

Judge Samuel Der-Yeghiayan

RAUL CHAIDEZ,

Defendant.

MOTION FOR EARLY TERMINATION OF PROBATION

NOW COMES Defendant, **RAUL CHAIDEZ**, by and through his attorney, ALEXANDER M. SALERNO, and petitions this Honorable Court to terminate RAUL CHAIDEZ's probation and in support thereof, the Defendant states and alleges as follows:

1. That on February 21, 1991, some seventeen (17) years ago, the Defendant, RAUL CHAIDEZ, was arrested and charged in a drug conspiracy in the Northern District of Indiana, Hammond Division.
2. That Mr. Chaidez was eventually sentenced to 200 months incarceration and a period of five years of supervised release.
3. That Mr. Chaidez while incarcerated, was a model prisoner. The Defendant has attached hereto and incorporated herein by reference, a memorandum from his Federal

Correctional Institution in Pekin, Illinois, as an example of his superior development and transition of his life while in prison. Mr. Chaidez exceeded all expectations through hard work and demonstrated initiative on any job that he was given and his work record with the institutions were exemplary and without blemish.

4. Mr. Chaidez has tendered additional letters to his probation officer, Juan Tapia. If the Court wishes to inquire, Mr. Tapia is cognizant of all his development in the prison which to reiterate, was unblemished and showed great development in his life.

5. That on March 22, 2006, Raul Chaidez was released to the halfway house in Chicago. He made a superb transition through the halfway house, began his probation, and has been a model probationer throughout the period of probation in this case. In fact, he is currently employed by Solar Spring Wire Forms in Schiller Park, Illinois. He is a second shift supervisor. Defendant has attached hereto and incorporated herein by reference, a letter from the owner of the company attesting to his development.

6. That in addition to his exemplary work record while on probation, the Defendant has obeyed all missives of his probation, has not tested positive for drugs, has obeyed each and every rule and has made great development and has shown that he is a responsible citizen in the same way that he showed he was a responsible individual while incarcerated. He is a grandfather and also a father of two children. He lives in the same marital home that he lived prior to his arrest and incarceration. He has done everything

humanly possible to change his life and become a faithful law abiding citizen, and therefore some consideration should be given to Mr. Chaidez.

7. In addition, attached hereto and incorporated herein by reference, is a letter in Spanish that has been translated by Attorney Alexander M. Salerno's office, and Mr. Chaidez's mother's birth certificate. As this Court can see, Ms. Chaidez, the Defendant's mother, is 88 years old, has severe degenerative arthritis and is incapacitated to the point that she cannot travel to visit her son, and is in need of care from her son, Raul, and his brothers and sisters.

8. That Raul has a wonderful immediate family and all of the brothers and sisters have been participating and caring for his mother, however, Raul's assistance is needed and Raul would like to travel back and forth to Mexico for long periods of time to assist in his mother's care, to help her with her legal affairs, and to spend time with his mother because of her age and their close relationship and continue to establish his relationship with his mother that he loves very much.

9. That based upon his extraordinary development in prison, his complete transition in life, his current job and status of law abiding citizen and the need for additional travel and care of his mother in a foreign country, the Defendant believes that he is a candidate and asks this Court to grant him early termination of probation.

WHEREFORE, the Defendant, RAUL CHAIDEZ, prays this Honorable Court:

- A. Hear arguments on this matter;
- B. Terminate RAUL CHAIDEZ's probation instanter;
- C. For further relief that is just and proper under the circumstances.

Respectfully submitted,

s/ Alexander M. Salerno

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